

December 28, 2021

**VIA ECF**

The Honorable Pamela K. Chen  
United States District Court,  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

Re: *Jingrong et al. v. Chinese Anti-Cult Alliance et al.*, 15-cv-1046-PKC-VMS  
Joint Status Report

Dear Judge Chen:

The parties hereby jointly respond to the Court's Order dated November 16, 2021 (the "Order"), which requires an update regarding the stay of this action that is in effect.

On December 7, 2021, the Second Circuit denied Plaintiffs' November 18, 2021 petition for a rehearing or *en banc* review of its October 14, 2021 decision.

Considering the above, the parties agree that the current stay that is in place should remain in place for thirty (30) more days to allow the Parties to confer with their clients as to next steps. The difficulty involved in reaching our clients is due not only to the total number of clients (17) and the language barriers and need for translation, but also to the difficulty in reaching all clients during the Holiday season.

For the above reasons, the parties agree, and respectfully jointly submit, that the stay of this case be extended for thirty (30) days.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Tom M. Fini

/s/ Terri E. Marsh

Cc: All counsel of record